

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.)	
)	
Plaintiffs,)	
)	
v.)	
)	
HARRIS COUNTY, TEXAS, et al.)	Case No. 16-cv-01414
)	(Consolidated Class Action)
)	The Honorable Lee H. Rosenthal
Defendants.)	U.S. District Judge
)	
)	

**Emergency Request for Oral Hearing on Defendants' Opposed Motion to Stay, or, in the
Alternative, Motion to Continue the Preliminary Injunction Hearing and Consolidate
with Expedited Hearing on the Merits**

Harris County, the Hearing Officers, the County Criminal Court at Law Judges Nos. 1 through 15, and Sheriff Gonzalez (collectively, "Defendants") file this Emergency Request for Oral Hearing on Defendants' Motion to Stay, or, in the Alternative, Motion to Continue the Preliminary Injunction Hearing and Consolidate with Expedited Hearing on the Merits ("Motion").

All the parties and the Court would benefit from an oral hearing on Defendants' Motion. An oral hearing will allow some of the key stakeholders to explain the changes to the system, and explain why, a hastily entered preliminary injunction, will do more harm than good. An oral hearing will also allow both the Court and the Plaintiffs the opportunity to question the stakeholders. The system that is on the near horizon will resolve all the claims in this lawsuit. An oral hearing is the best way to satisfy both the Court and the Plaintiff of this fact.

Accordingly, Defendants respectfully request that the Court set an oral hearing on their Motion. Defendants further request that the hearing be set in advance of the February 21, 2017 preliminary injunction hearing. The Defendants are available any day, except that Kelvin Banks, the director of Pretrial Services—a key stakeholder and key witness at the hearing—in unavailable on February 15th and 16th.

Therefore, Defendants respectfully request an oral hearing on their Motion any day prior to February 21, 2017, except February 15 and 16.

Respectfully Submitted,

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Certificate of Service

I certify that on the 2nd of February, 2017, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court.

/s/ Katharine D. David
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